

NICHOLAS A. TRUTANICH
 United States Attorney
 District of Nevada
 Nevada Bar Number 13644
 DANIEL D. HOLLINGSWORTH
 Assistant United States Attorney
 Nevada Bar No. 1925
 501 Las Vegas Boulevard South, Suite 1100
 Las Vegas, Nevada 89101
 (702) 388-6336
 Daniel.Hollingsworth@usdoj.gov
 Attorneys for the United States

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	2:13-CR-439-KJD-VCF
)	
Plaintiff,)	Stipulation to Enter the Exhibits
)	Referenced in the Motion for Forfeiture,
v.)	ECF No. 575
)	
SEAN FINN,)	
)	
Defendant.)	

The United States of America and Sean Finn through his counsel, Dustin R. Marcello, agree to the following:

1. The Exhibits hand delivered on or about August 5, 2020, and listed in the Index of Exhibits attached hereto and incorporated herein as if fully set forth herein, are admitted as fact and are admitted as evidence.
2. Each party reserves the right to argue the significance of the admitted exhibits.
3. Each party acknowledges and warrants that its execution of the Stipulation is free and is voluntary.
4. The Stipulation contains the entire agreement between the parties.
5. Except as expressly stated in the Stipulation, no party, officer, agent, employee, representative, or attorney has made any statement or representation to any other party, person, or entity regarding any fact relied upon in entering into the Stipulation, and no party, officer, agent, employee, representative, or attorney relies on such statement or representation in executing the Stipulation.

6. The persons signing the Stipulation warrant and represent that they have full authority to execute the Stipulation and to bind the persons and/or entities, on whose behalf they are signing, to the terms of the Stipulation.

7. This Stipulation shall be construed and interpreted according to federal forfeiture law and federal common law. The jurisdiction and the venue for any dispute related to, and/or arising from, this Stipulation is the unofficial Southern Division of the United States District Court for the District of Nevada, located in Las Vegas, Nevada.

8. This Stipulation shall not be construed more strictly against one party than against the other merely by virtue of the fact that it may have been prepared primarily by counsel for one of the parties; it being recognized that both parties have contributed substantially and materially to the preparation of this Stipulation.

IT IS HEREBY CERTIFIED, pursuant to 28 U.S.C. § 2465(a)(2), that there was reasonable cause for the seizure and forfeiture of the property.

DATED: August 28, 2020

PITARO & FUMO

/s/ Dustin R. Marcello
DUSTIN R. MARCELLO
Counsel for Sean Finn

DATED: August 28, 2020

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Daniel D. Hollingsworth
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: 9/1/2020

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SEAN FINN,

Defendant.

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**Index of Provided Discovery Exhibits and
Additional Exhibits* as of August 5, 2020**

Exhibit A Grant Liverett Escrow Receipt
Exhibit A-1 Grant Liverett Incoming Fed Wire to CES Union Bank
in the amount of \$225,000
Exhibit A-1-a CES Union Bank Statement with \$225,000 incoming wire transfer
Exhibit A-1-b CES Outgoing Wire Transfer of \$188,900 and CES Union Bank Statement
Exhibit A-1-c CES Outgoing Wire Transfer of \$15,000 and CES Union Bank Statement
Exhibit A-1-d CES Outgoing Wire Transfer of \$4,500 and CES Union Bank Statement
Exhibit A-1-e CES Outgoing Wire Transfer of \$17,500 and CES Union Bank Statement
Exhibit A-1-f M.Y. Consultants BOA Statement with \$188,900 incoming wire transfer
Exhibit A-1-g Anthony Brandel BOA Statement with \$15,000 incoming wire transfer
Exhibit B Grant Liverett Joint Venture Agreement
Exhibit C Grant Liverett Joint Escrow Instructions
Exhibit C-1 Anthony Brandel email to Release the Funds for Grant Liverett's Escrow
Exhibit D Natalie Allen Escrow Instructions

Exhibit D-2 Letter from STI Family Office to M.Y. Consultants dated 10/22/09

Exhibit E..... Natalie Kristina Allen Crosby Joint Venture Agreement

Exhibit E-1 Letter from Martin Schlaepfer to M.Y. Consultants dated 10/20/09

Exhibit E-2 Natalie Kristina Allen Crosby - Joint Venture Agreement

Exhibit E-3Natalie Kristina Allen Crosby – Victim Impact Statement

Exhibit F Jill Schrecongost Escrow Receipt

Exhibit F-1 Letter from Jill Schrecongost to Chicago Title to Release funds to CES

Exhibit F-4 Jill Schrecongost Fed Wire of \$300,000 to CES Union Bank

Exhibit F-4-a ... CES Incoming Wire Transfer for \$300,000 and CES Union Bank Statement

Exhibit F-4-b CES Outgoing Wire Transfer of \$286,300 and CES Union Bank Statement

Exhibit F-4-c CES Outgoing Wire Transfer of \$10,000 and CES Union Bank Statement

Exhibit F-4-d M.Y. Consultants BOA Statement with \$286,300 incoming wire transfer

Exhibit F-4-e Anthony Brandel BOA Statement with \$10,000 incoming wire transfer

Exhibit F-4-f..... CES check for \$3,700, escrow fees for 5642-AH

Exhibit F-5 Letter from M.Y. Consultants to release escrow
re: Jill Schrecongost dated 7/19/10

Exhibit F-6 Email from Jill Schrecongost to James Warras dated 4/27/11

Exhibit F-7 Union Bank Wire Transfer 7/20/10

Exhibit G Jerry Hanks Victim Impact Statement

Exhibit G-1 Jerry Hanks Joint Escrow Instructions

Exhibit G-2 Jerry Hanks Fed Wire to Union Bank

Exhibit G-2-a CES Union Bank Statement with \$100,000 incoming wire transfer

Exhibit G-2-b ... CES Incoming Wire Transfer of \$150,000 and CES Union Bank Statement

Exhibit G-2-c.....CES Outgoing Wire Transfer of \$131,500 and CES Union Bank Statement

Exhibit G-2-d CES Outgoing Wire Transfer of \$100,000 and CES Union Bank Statement

Exhibit G-2-e..... CES Outgoing Wire Transfer of \$15,000 and CES Union Bank Statement

Exhibit G-2-f M.Y. Consultants BOA Statement with \$131,500 Incoming Wire Transfer

Exhibit G-2-g Allen Smith BOA Statement with \$100,000 Incoming Wire Transfer

Exhibit G-2-h Anthony Brandel BOA Statement with \$15,000 Incoming Wire Transfer

Exhibit G-3 Disbursements from Union Bank related to Jerry Hanks

Exhibit G-4 Anthony Brandel BOA Statement re: \$15,000 related to Jerry Hanks

Exhibit G-5 M.Y. Consultants BOA Statement re: \$131,500 related to Jerry Hanks

Exhibit G-6 Allen Smith BOA Statement re: \$100,000 related to Jerry Hanks

Exhibit G-7 J&H Capital Chase Bank Statements with incoming wires from Jerry Hanks

Exhibit G-7-a Viola Wright Affidavit of JP Morgan Chase Bank records

Exhibit H Eric Krupa Escrow Receipts

Exhibit H-1 Eric Krupa Wires to CES re: \$50,000 and \$380,000

Exhibit H-1-a CES Union Bank Statement with \$380,000 and \$50,000 Incoming Wires

Exhibit H-1-b CES Outgoing Wire Transfer of \$299,700 and CES Union Bank Statement

Exhibit H-1-c CES Outgoing Wire Transfer of \$200,000 and CES Union Bank Statement

Exhibit H-1-d CES Outgoing Wire Transfer of \$25,000 and CES Union Bank Statement

Exhibit H-1-e M.Y. Consultants BOA Statement with \$299,700 Incoming Wire Transfer

Exhibit H-1-f Allen Smith BOA Statement with \$200,000 Incoming Wire Transfer

Exhibit H-1-g Anthony Brandel BOA Statement with \$25,000 Incoming Wire Transfer

Exhibit K Disbursement of Illegal Proceeds

Exhibit L SEC's schedule of illegal proceeds deposits into Brandel's account

Exhibit M SEC's transcripts of Brandel's testimony

Exhibit 1412 Funds sent from MY Consultants to Sean Finn

*Admitted Trial Exhibits are not provided here as they have been previously provided.